

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

RE: BAY STATE GAS COMPANY

DTE 06-31

**JOINT MOTION TO EXTEND THE TENTATIVE DEADLINE FOR A
FINAL ORDER**

Now comes United Steel, Paper And Forestry, Rubber, Manufacturing, Energy, Allied Industrial And Service Workers International Union ("USW"), Utility Workers Union Of America, Local 273 ("UWUA"), the Attorney General of the Commonwealth ("Attorney General"), and Bay State Gas Company ("Bay State") and respectfully request that the Department of Telecommunications and Energy ("Department") permit its Final Order to be issued beyond the end of the third quarter of 2006. As good cause to extend the deadline tentatively established by the Department's Order in D.T.E. 05-27, the parties state and agree that such action is appropriate in order to ensure a complete and orderly resolution of this proceeding.

Wherefore, the USW, UWUA, Attorney General and Bay State respectfully request that this Motion be granted by the Department for good cause shown.

Respectfully submitted,

UNITED STEEL, PAPER AND
FORESTRY, RUBBER,
MANUFACTURING, ENERGY, ALLIED
INDUSTRIAL AND SERVICE WORKERS
INTERNATIONAL UNION, AFL-CIO

By its attorneys,

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Dated: July __, 2006

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COMMONWEALTH OF
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